



BellSouth Telecommunications, Inc.

333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

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REGULATORY AUTH.
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Joelle J. Phillips
Attorney

615 214 6311
Fax 615 214 7406

OFFICE OF THE
EXECUTIVE SECRETARY
July 8, 2002

VIA HAND DELIVERY

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

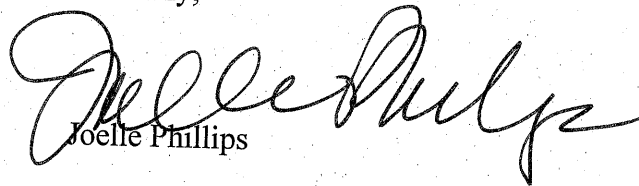
Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare Switching an Unrestricted Unbundled Network Element*
Docket No. 02-00207

Dear Chairman Kyle:

Enclosed herein for filing, please find the original and thirteen copies of an Agreed Motion Regarding Filing Deadlines during the Week of July 1st through July 5th, 2002. Copies of the enclosed have been provided to counsel of record.

In light of the statutory changes enacted by the General Assembly, BellSouth is directing its filings to the attention of the Chairman of the Authority until otherwise instructed.

Cordially,


Joelle Phillips

JP/jej

Enclosure

POSTED
7/9/02

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re: *Petition of Cinergy Communications Company for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*
Docket No. 01-00987

Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare Switching an Unrestricted Unbundled Network Element
Docket No. 02-00207

Generic Docket to Consider Technology Advances
Docket No. 02-00434

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 97-00309

AGREED MOTION REGARDING FILING DEADLINES
DURING THE WEEK OF JULY 1ST THROUGH JULY 5TH, 2002

The undersigned parties in the dockets described herein file this joint Agreed Motion to adjust filing deadlines in light of the government shutdown pending during the week of July 1st through July 5th. The parties have inquired and been informed that the Tennessee Regulatory Authority ("TRA") will not be accepting any filings during the week of July 1st through July 5th, in light of the shutdown of various government offices in Tennessee and the temporary furlough of Tennessee state employees. Because the parties are without any opportunities to file any items with the TRA, and because deadlines have been established in various dockets pending before the TRA during the week of July 1st through July 5th, the parties respectfully request that they be allowed to make those filings as follows:

1. **Cinergy Arbitration (01-00987)**. In this docket, rebuttal testimony is currently set to be filed on July 2nd. The parties respectfully request that this date be continued until July 9th.

2. **UNE-P (02-00207)**. The parties received the order regarding motions to compel certain discovery responses on June 28th. Those responses were due to be filed on Friday, July 5th. The parties respectfully request that those responses instead be due on July 10th, and that the deadlines for direct testimony and rebuttal testimony also be continued such that direct testimony, due on July 12th would be due instead on July 19th. Rebuttal testimony which is due on July 26th would instead be due on August 2nd.

3. **Technology Advances Docket (02-00434)**. The parties respectfully request that the responses to the motion for reconsideration be filed on Friday, July 12th and supplemental comments be continued until July 19th.

4. **271 (97-00309)**. In this docket, there are no filings which have been formally set for the week of July 1st through July 5th; however, BellSouth intended to respond to a motion to compel during that time. In the event that BellSouth elects to supplement its discovery, either in lieu of responding to the motion to compel or in addition to responding to the motion to compel, BellSouth intends to serve such supplemental discovery on the parties during the week of July 1st through July 5th and file such supplemental discovery immediately after the TRA begins accepting filings again.

CONCLUSION

In light of the extraordinary circumstances arising from the Tennessee state government shutdown, the parties respectfully request that the foregoing presents a reasonable solution to the problems presented by the inability of the TRA to accept filings during the week of July 1st through July 5th. Moreover, the solution is the only practicable solution, which would not unfairly penalize the parties for the failure to meet filing deadlines under circumstances in which the agency is unable to accept filings.

Respectfully submitted,



Guy M. Hicks

BELLSOUTH TELECOMMUNICATIONS, INC.
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301



Henry Walker

BOULT, CUMMINGS, CONNERS & BERRY
Post Office Box 198062

Nashville, Tennessee 37219-8062
(615) 252-2363

Attorney for:

Cinergy

Access Integrated Network, Inc.

Birch Telecom of the South, Inc.

Ernest Communications, Inc.

MCI metro Access Transmission Services, LLC,

MCI WorldCom Communications, Inc., and

Brooks Fiber Communications of Tennessee, Inc.
(collectively "WorldCom")

NewSouth Communications Corp.

Z-Tel Communications, Inc.

Association of Communications Enterprises

AT&T Communications of the South Central States
and TCG MidSouth, Inc. (collectively "AT&T")

DIECA Communications, Inc. d/b/a Covad

Communications Company

ITC^DeltaCom Communications, Inc.

Network Telephone Corporation

Southeastern Competitive Carriers Association

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farris-law.com

- ☒ Mail

Andrew O. Isar, Esquire
ASCENT
7901 Skansie Ave., #240
Gig Harbor, WA 98335

